

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

---

Kimball Area Public Schools,  
Independent School District No. 739,

Civil Case No. 23-CV-02637 (NEB/LIB)

Plaintiff/ Counterclaim Defendant,

**MOTION TO COMPEL  
DISCOVERY**

v.

I.R.M., by and through his Parent,  
L.M.,

Defendants/ Counterclaim  
Plaintiffs.

---

TO: Defendants/ Counterclaimants I.R.M., by and through his Parent, L.M., and their Attorney, Margaret O’Sullivan Kane, Kane Education Law, LLC, 1654 Grand Ave, St. Paul, MN 55105.

**PLEASE TAKE NOTICE** that Plaintiff/ Counterclaim Defendant Kimball Area Public Schools, Independent School District No. 739 (“District”) hereby moves the Court for an order compelling Defendants/ Counterclaim Plaintiffs (“Counterclaimants”) to provide responses to the District’s written discovery requests (specifically, its Interrogatories and Requests for Documents) pursuant to Federal Rule of Civil Procedure 37(a)(3)(B) and for an order awarding the District its costs and expenses incurred in bringing this motion pursuant to Federal Rule of Civil Procedure 37(d)(3). The District’s motion is based upon all the files, records and proceedings herein, including the District’s memorandum of law, declarations and exhibits, and supporting documents filed herewith.

**SQUIRES, WALDSPURGER  
& MACE P.A.**

Dated: January 28, 2025

By: /s/ William M. Seiler  
Elizabeth J. Vieira (Atty. No. 392521)  
William M. Seiler (Atty. No. 0402743)  
333 South Seventh Street, Suite 2800  
Minneapolis, MN 55402  
P: (612) 436-4300  
F: (612) 436-4340  
liz.vieira@raswlaw.com  
will.seiler@raswlaw.com

**ATTORNEYS FOR PLAINTIFF/  
COUNTERCLAIM DEFENDANT  
KIMBALL AREA PUBLIC SCHOOLS**